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Hearing Date: January 12, 2012 at 10:00 a.m.

Objection Deadline: January 5, 2012 at 4:00 p.m.

*Attorneys for Paul Feinsilver, James A. Klotz
and Terrance O'Grady*

EMMET, MARVIN & MARTIN, LLP

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Attorneys for The Bank of New York Mellon, as Indenture Trustee

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

DPH HOLDINGS CORP., et al.,

Reorganized Debtors.

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Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the attached Motion of The Bank Of New York Mellon, as Indenture Trustee, Paul Feinsilver, James A. Klotz and Terrance O'Grady for Permission to Proceed in the Appropriate Tribunal as Against the Reorganized Debtors (***"Motion"***), a hearing will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, on January 12, 2012 at 10:00 a.m. (***"Hearing Date"***) at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, NY 10601, or as soon thereafter as counsel can be heard, for the entry of the proposed Order granting the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Motion must be (a) in writing, (b) in compliance with the following paragraph regarding electronic filing, (c) filed with the Bankruptcy Court (with a courtesy copy provided directly to Judge Drain's Chambers), and (d) served upon the attorneys for Paul Feinsilver, James A. Klotz and Terrance O'Grady, Morrison Cohen LLP, 909 Third Avenue, New York, NY 10022, Attn: Andrea Fischer, Esq., and attorneys for The Bank of New York Mellon, as Indenture Trustee, Emmet, Marvin & Martin, LLP, 120 Broadway, New York, NY 10271, Attn: Edward P. Zujkowski, Esq., so as to actually be received no later than 7 days prior to the Hearing Date.

PLEASE TAKE FURTHER NOTICE that any objections filed by the parties with legal representation must be filed (a) (i) through the Bankruptcy Court's electronic filing system, which may be accessed a password (which is available by contacting the Bankruptcy Court's technical assistance at (914) 390-4060, Monday through Friday, 8:30 a.m. to 5:00 p.m.) through the Internet at the Bankruptcy Court's website: www.nysb.uscourts.gov, using Netscape Navigator software version 3.0 or higher, and (ii) in portable document format (PDF) using Adobe Exchange software for conversion; or (b) if a party is unable to file electronically, such party must submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, court document number of the document to which the objection refers, and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use PDF format, such party must submit the objection on a diskette in either a Word, WordPerfect, or DOS text (ASCII) format. An objection filed by a party with no legal representation must comply with sections (b) or (c) as set forth in this paragraph.

Dated: New York, New York
December 12, 2011

MORRISON COHEN LLP

*Attorneys for Paul Feinsilver, James A. Klotz
And Terrance O'Grady*

By: /s/ Andrea Fischer

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EMMET, MARVIN & MARTIN, LLP

*Attorneys for The Bank of New York Mellon,
as Indenture Trustee*

By: /s/ Edward P. Zujkowski

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